

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: :
:
ROBERT EDWARD ROTH : Bankruptcy No. 19-12753ELF
:
Debtor(s) : Chapter 13

OBJECTION OF SCOTT F. WATERMAN, ESQ., STANDING CHAPTER 13
TRUSTEE, TO DEBTOR'S SECOND AMENDED CHAPTER 13 PLAN

Scott F. Waterman, Esq., Standing Chapter 13 Trustee, files this Objection to the Debtor's Second Amended Chapter 13 Plan Pre-Confirmation and in support thereof represents as follows:

1. Scott F. Waterman, Esq., is the duly qualified and acting Chapter 13 Trustee in the above captioned case.
2. The debtor proposes to pay a total of \$62,533.80 over the remaining term of the Chapter 13 plan.
3. The second amended plan provides that the debtor shall pay the Trustee \$1,042.23 per month for sixty (60) months.
4. The debtor fails to dedicate all disposable income available to pay unsecured creditors.
5. The modified plan calls for sale of real estate by April 30, 2020.
6. The debtor attempts to take phantom mortgage expenses of \$3,442.00 from

May, 2020 through March 02, 2021.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, respectfully requests that the Debtor's Second Amended Chapter 13 Plan Pre-Confirmation be denied.

Respectfully submitted,

Date: January 2, 2020

/s/Scott F. Waterman
Scott F. Waterman, Esq.
Standing Chapter 13 Trustee
Reading, PA 19606
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